



Dover Leisure Centre

Sequential Test Assessment

Dover District Council

FINAL DRAFT

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1 Introduction

1.1 Purpose of this Report

- 1.1.1 DHA Planning has been instructed by The Sports Consultancy on behalf of Dover District Council to prepare an independent Sequential Test assessment in relation to the development of a new Dover Leisure Centre, that is proposed to involve the relocation of the centre from its existing edge of town centre site to an out of centre location at White Cliffs Business Park, Whitfield. The development is to include an 8 lane swimming pool, learner pool, 4 court sports hall, 120 station health and fitness studio, 3 multi-activity studios, spin studio, 2 squash courts, changing rooms, toilets, equipment storage, reception, offices/back of house, cafe and sufficient parking spaces and service areas. The proposals also include outdoor changing rooms and two 5-a-side 3G football pitches.
- 1.1.2 In accordance with the requirements set out in the National Planning Policy Framework (NPPF), this Sequential Test considers the availability, suitability and viability of potential alternative sites in existing centres and edge of centre locations.
- 1.1.3 The Sports Consultancy, in partnership with GT Architects, Faithful+Gould and Hadron Consulting, were appointed by Dover District Council in July 2015 to complete an initial feasibility and options appraisal study for the improvement and replacement of the existing Dover Leisure Centre. The Feasibility and Options Appraisal Study for Dover Leisure Centre' was published in 2015.
- 1.1.4 This original feasibility work has provided an extremely useful starting point and evidence base for this report, although DHA Planning have subsequently undertaken a further independent review of the identified need for sports facilities within Dover, to establish what the correct baseline should be in terms of the Sequential Test. Potential alternative sites have also been sought and assessed independently, having regard to and critically assessing the content of the work already carried out.
- 1.1.5 As such, DHA have produced this standalone document, which considers the leisure centre development with specific regard to the Sequential Test and strict planning methodology this applies.

2 Identifying the Need

2.1 District-Wide Context

- 2.1.1 As the Government's 'Sporting Future: A New Strategy for an Active Nation' (December 2015) sets out, sport is a key part of local communities and Councils have an important leadership role to play, bringing schools, voluntary sport clubs, National Governing Bodies of sport (NGBs), health and the private sector together to forge partnerships, unblock barriers to participation and improve the local sport delivery system. So local authorities have, and will continue to have, an absolutely crucial role to play in delivering sport and physical activity opportunities.
- 2.1.2 Dover District Council already recognises that there is a need within Dover for the provision of leisure facilities including opportunities for sport, play and relaxation to improve. In this case Dover District Council aim to take this opportunity to significantly improve the provision of indoor sports facilities in Dover. The aspiration is to provide a broader base of facilities than are currently available and the Council have recently consulted on their draft Indoor Sports Facility Strategy (February 2016), which considers existing and future supply and usage to provide recommendations for future delivery.
- 2.1.3 As part of the original feasibility work, a detailed needs analysis was conducted to identify the current and future (up to 2026) provision required to meet the indoor sport facility needs of Dover Residents. The Facility Planning Model (FPM) reports from Sports England (2015), the Latent Demand Report for Health and Fitness Membership and various stakeholder consultations were used to assess the needs in the area and the feasibility dovetails with the Indoor Sports Facility Strategy work and needs identified therein.
- 2.1.4 In summary in the feasibility and draft strategy it was identified that the district in particular has a low level of swimming pool provision of 8.88m² water space per 1,000 population in Dover. In terms of the other forms of provision, it was identified that overall the district has a relatively low level of sports hall provision (3+ court) but with improved projected supply, that indoor bowls provision is sufficient to meet need, and that there is no additional requirement for squash courts or indoor tennis courts. It has been noted that there is latent demand for gymnastics, health and fitness suites and dance and aerobic studios. From the outcomes of the detailed needs analysis, the following recommendations for a new Dover Leisure Centre were provided in the feasibility:
- Main Pool - 6 or 8 lane 25m pool (6 to replace the existing provision and 8 to increase provision);
 - Learner Pool – learner pool with moveable floor;
 - Sports Hall – 4-8 courts to be considered – although the 2026 projections noted in the draft strategy assume 4 court provision and show improved supply;
 - Health and fitness – 120 stations could be supported;
 - Multi activity studio – 2-3 studios;

- Spin studio – spin studio provided in larger facility options;
- Squash courts – maximum of 3 courts; and
- Parking spaces – requirements based on scale of facility option and KCC parking standards.

2.2 Options

- 2.2.1 The first option is the 'do nothing' option and instead maintain the existing facility at its present level. This is not a feasible option. The facilities at Dover Leisure Centre were built in the 1970s and have now come to the end of their operational life span, as is recognised within the adopted Core Strategy (paragraph 2.55) and the more recent detailed feasibility report.
- 2.2.2 The second option involves the refurbishment of the existing Dover Leisure Centre facilities. The refurbishment would involve retaining some or all of the existing buildings and undertaking significant works to reconfigure the building to provide an appropriate range of facilities required. This is also not a feasible option. The feasibility confirms that refurbishment and reconstruction will only extend the life of the building for another 20 years and in terms of cost is deemed to be only marginally less expensive compared to the new build options. Furthermore, the centre would be closed for a period of between 12-18 months to allow for the refurbishment works to be carried out and subsequently would not allow for a continuity in service. Continuity of service provision is key and a fundamental requirement. The existing leisure centre is the primary indoor sports facility in the principal urban settlement in the District, the importance of which is recognised within the Core Strategy and draft Indoor Sports Facility Strategy. Its loss for any lengthy period of time would therefore have significant impacts which the Council, as service provider, have confirmed would not be something that could be entertained.
- 2.2.3 In addition to the refurbishment of the existing centre, five new build options were considered in the 2015 feasibility study, in response to the identified current and future needs of the catchment population. The new build options provide a long-term solution and the opportunity to provide a high quality efficient leisure centre, which contributes to meeting the needs of the District. A new build option would also allow for the continuity of service of the existing Dover Leisure Centre if an alternative suitable site is chosen for the new leisure facilities. A summary of the refurbishment option and the five new build options presented in the feasibility is provided overleaf.

Refurbishment	New Build Option 1	New Build Option 2	New Build Option 3	New Build Option 4	New Build Option 5
6 lane x 25m pool	6 lane x 25m pool	6 lane x 25m pool	6 lane x 25m pool	8 lane x 25m pool	8 lane x 25m pool
Learner pool	15m x 8.5m learner pool (moveable floor)	15m x 8.5m learner pool (moveable floor)	15m x 8.5m learner pool (moveable floor)	15m x 8.5m learner pool (moveable floor)	15m x 8.5m learner pool (moveable floor)
8 court sports hall	No sports hall	4 court sports hall	8 court sports hall	4 court sports hall	8 court sports hall
65 health & fitness stations	120 health & fitness studios	120 health & fitness studios	120 health & fitness studios	120 health & fitness studios	120 health & fitness studios
1 multi activity studio	2 multi activity studios	2 multi activity studios	3 multi activity studios	3 multi activity studios	3 multi activity studios
No spin studio	No spin studio	No spin studio	1 spin studio	1 spin studio	1 spin studio
3 squash courts	0 squash courts	0 squash courts	3 squash courts	3 squash courts	3 squash courts
90 parking spaces	160 parking spaces	200 parking spaces	250 parking spaces	250 parking spaces	250 parking spaces

Table 2.1 Feasibility Options Summary

2.2.4 As the 2015 feasibility study concludes, the new build option is the preferred route for Dover Leisure Centre. Whilst it will have higher cost implications, a new build is deemed to be more viable and will result in the provision of higher quality leisure facilities. A new centre could be built on an alternative site, allowing the existing centre to remain operational for the duration of the build period and allowing for the continuity in the service provision.

2.2.5 In line with the detailed needs analysis, new build option 4 has been chosen by the Council as the baseline position from which to develop a proposed facility mix and is considered to be the most suitable option in terms of meeting the identified needs for the wider district. In particular, it accommodates the larger 8 lane pool which is identified as the main deficiency within the district. The provision of a 4 court sports hall was also considered sufficient despite the existing centre comprising 8 courts, as the draft Indoor Sports Facility Strategy has already accounted for this.

2.2.6 In developing a proposed facility mix, the Council have taken Option 4 as the starting point and undertaken a more comprehensive costing and viability exercise whilst also visiting comparable facilities to note successful and not so successful designs and facilities. This has informed development of the facility mix and design that is being taken forward to planning application stage and includes the following changes from the feasibility Option 4 mix:

- Provision of 2 squash courts instead of 3;
- Increased parking provision to c. 340 spaces;

- Outdoor changing with 2 external 3G 5-a-side football pitches;
- Provision of children's soft play and/or 'clip and climb' facility to broaden facility offer and enhance viability

2.2.7 Whilst the 4 court sports hall provision has been considered sufficient in light of the draft Indoor Sports Facility Strategy and projected supply, further review of evidence of need and visiting other facilities with a similar offer has identified the importance of additional 5-a-side 3G pitch provision, intrinsically linked to the wider facility. This is different to an associated multi-use 3G pitch as was originally mooted in the feasibility study and has emerged as a fundamental component of the facility mix, relieving pressure and demand placed upon the sports hall for other uses.

2.2.8 In view of the extensive feasibility undertaken by the Council and their specialist consultant team, and having reviewed this work, this and the subsequent refinement of Option 4 is considered to represent a robust and reasonable basis upon which to base this Sequential Test Assessment.

2.2.9 Whilst the above mix is being taken forward, it should be noted that the Indoor Sports Facility Strategy remains in draft form and consultation responses received during the recent consultation exercise are being reviewed. Any change to the strategy as a result of this should trigger a review of the proposed mix and in turn this report.

3 Planning Policy Background

3.1 The NPPF and the Need for a Sequential Assessment

- 3.1.1 Paragraph 24 of the NPPF requires planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date development plan to be supported by a sequential assessment which assesses alternative sites according to the prescribed hierarchy of location i.e. defined town centres, followed by edge of centre locations. PPS4, which previously dealt with town centre issues, has now been superseded by the NPPF and the corresponding Practice Guidance note has also been superseded by the Planning Practice Guidance which details the methodology that should apply.
- 3.1.2 The assessment should not only identify alternative sites but assess their availability, suitability and viability as an alternative option to the application proposal. The objective for such an assessment is to establish whether there are any other alternative sites that are in sequentially preferable locations that could reasonably and suitably accommodate and deliver the proposed development.
- 3.1.3 In this instance, the proposed redevelopment of the existing Dover Leisure Centre at White Cliffs Business Park falls outside of any defined town centre, and the proposed leisure centre is classed as a 'main town centre use' under the terms of the NPPF. The NPPF Glossary at Appendix 2 defines 'main town centre uses' and includes "*leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres indoor bowling centres, and bingo halls)*". A leisure centre fits within this description and thus a sequential test is required in accordance with Paragraph 24.
- 3.1.4 The requirements for a sequential assessment are set out within the Planning Practice Guide, which sets out what is deemed to be a "town centre" and what is deemed to be "edge of town centre". A town centre is defined as the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. Edge of centre locations are defined as the area within 300 metres of the town centre boundary for non-retail town centre uses such as leisure.

3.2 The Development Plan

- 3.2.1 The adopted Proposals Map, which reflects the policies of the development plan and any allocations or designations contained therein, defines the extent of Dover Town Centre.

Core Strategy (2010)

- 3.2.2 The adopted Dover Core Strategy sets out a spatial strategy for growth and identifies Dover as the major focus for development in the district. One of the district objectives is to ensure that the Strategy's infrastructure needs are identified and that required infrastructure is provided at the right time.

- 3.2.3 **Core Policy 6** states that in determining infrastructure requirements applicants and infrastructure providers should first consider if existing infrastructure can be used more efficiently, or whether demand can be reduced through promoting behavioural change, before proposing increased capacity through extending or providing new infrastructure.
- 3.2.4 The Core Strategy notes that the Dover Leisure Centre is becoming outdated (Para 2.55).

Land Allocations Local Plan (2015)

- 3.2.5 The Land Allocations Plan was adopted in January 2015 and identifies and allocates specific sites that are suitable for development in order to meet the Core Strategy's requirements and in doing so make a major contribution to delivering the Strategy.
- 3.2.6 The plan identifies Dover Leisure Centre as an 'Area of Change' and states that the focus for the area is to 'create and restore'. It notes that *"given that the existing building is near the end of its useful life, an opportunity exists to create a landmark building. Leisure facilities could be located at a different site, so long as it equally accessible to residents"* (Para 3.144).
- 3.2.7 The broad objectives set out by the plan are to investigate whether it will be possible to meet the need for modern, inclusive sport and recreation facilities by building new facilities on the existing site, or whether the Leisure Centre should be relocated and the site re-developed; and to ensure that any new development on the site fulfils the potential of this prominent location.

Local Plan Saved Policies (2002)

- 3.2.8 **Policy OS6** (Indoor sports and recreational facilities) states that proposals for indoor and recreational facilities will be permitted provided that any major new facility is located in Dover or Deal, at a site within the town centre, or if no such site is available, located on the edge-of-centre with good pedestrian and cycle links to the centre, or if no such site is available, is located elsewhere in the urban area on a site which is or can be made accessible by a range of transport modes, including public transport.

4 Sequential Assessment Methodology

4.1 Identified Search Area

- 4.1.1 The existing Dover Leisure Centre is situated within the urban built confines of Dover but outside of the Town Centre area as defined in the development plan. In terms of sequential assessment, the nearest centre is therefore Dover Town Centre within the local authority area of Dover District Council. Given the proposals relate to the replacement of Dover Leisure Centre, it is not necessary to consider any other town centres in the District and there are no other types of centre within the urban area defined in the development plan.
- 4.1.2 The NPPF and the National Planning Practice Guidance require a sequential assessment to first look at all potential sites in centres, before assessing edge of centre options. We have therefore assessed sites within the defined boundaries of Dover Town Centre and thereafter any sites that may fall to be considered as being located of the edge of this centre according to the National Planning Practice Guidance, i.e. within 300m of the defined town centre.
- 4.1.3 To ensure the sequential test is as robust as possible, the standard methodology has been adapted to reflect the particular circumstances of this development. As such, the assessment forms two distinct parts; firstly, the requirements of the NPPF are met in considering potential town centre and edge of centre sites. This is all that a sequential test is required to include. Separate to this, the assessment has been expanded to consider other potential sites in the urban area that do not fall within the town centre or an edge of centre location to inform the wider assessment of alternatives when undertaking the planning balance. This later part of the assessment does not comprise part of the formal Sequential Test Assessment.
- 4.1.4 Following pre application discussions with Dover District Council it has been agreed that the wider Dover urban area should be considered in line with the Land Allocations Local Plan (2015), which notes that the new leisure facilities could be located at a different non-centre or edge of centre site, so long as it equally accessible to residents. This expanded assessment methodology will therefore assist in informing the wider planning consideration and balance, albeit not necessarily including sites that are sequentially preferable in NPPF terms.

4.2 Parameters

Scale and Format

- 4.2.1 For the purpose of the Sequential Test, the proposed facility mix has been reviewed to consider what can reasonably be considered as the minimum required level and mix of provision. The Council have undertaken an in-depth feasibility study which has identified Option 4 as best meeting evidenced need having regard to the existing leisure centre provision to be replaced and this has since been refined further with the benefit of more detailed analysis. Having reviewed this feasibility and the current draft proposed facility mix, the findings are considered robust and unless a site is capable of delivering facilities that meet evidenced needs, there cannot be considered any reasonable prospect that the Council would commit the significant financial resources involved in delivering a new leisure

centre, notwithstanding its civic responsibilities more generally in meeting the needs of its residents.

- 4.2.2 Whilst the 2015 feasibility study option states that there is a need for approximately 250 parking spaces and subsequent work has identified a need for more, for the purposes of this sequential test, parking will be considered in accordance with the adopted parking standards for this types of development on a site specific basis, where other considerations indicate that further assessment is warranted. It is, for example, recognised that imposing a 250+ parking space requirement on a town centre site would be unreasonable in the context of this assessment, particularly when considering the current level of provision at the existing leisure centre site.
- 4.2.3 The 2015 feasibility study included a design feasibility that established minimum building footprints and site areas to accommodate each of the options considered, with either surface parking or decked parking. The Option 4 facilities mix requires a site area of 12,560m² if surface parking for 250 cars is assumed. The current draft proposals, through developing designs for the earmarked site, have identified a site area requirement in the region of 2 hectares (again assuming surface parking, but for 340 spaces). Notwithstanding this exercise and has already been identified, the provision of 250+ parking spaces is not considered a realistic requirement in the context of a town centre or edge of centre site. For the purposes of identifying a minimum site area to aid site assessment, the existing leisure centre site provides a useful benchmark. Although strictly edge of centre, the site directly adjoins the town centre and the many public car parks that are found there. Furthermore, the feasibility study shows that the Option 4 footprint can be accommodated on site (albeit being tight). The existing site measures 0.84 hectares and therefore to incorporate a reasonable degree of flexibility, it is considered that a minimum site area of 0.8 hectares provides a reasonable threshold for site assessment purposes.
- 4.2.4 This site area does not include an allowance for, or ability to accommodate, the outdoor 5-a-side pitches now proposed as an important part of the mix. This is considered in more detail below at 4.2.8 but in order to demonstrate a reasonable level of flexibility in the approach, is considered robust. Notwithstanding that, where a site is of a size where this provision is clearly precluded, this is taken into consideration when considering suitability in the wider sense. This approach ensures more sites are given due consideration than would otherwise be the case, again ensuring robustness.
- 4.2.5 It should be noted that the actual requirement for parking and landscaping space will vary according to the circumstances of each site, and so in some cases a smaller site may not provide sufficient space. It is also necessary to consider parking provision on a site by site basis given the variations in adopted parking standards by location. If adequate surface level parking is available close by, a smaller site with a reduced number of parking spaces could be considered viable where a site is readily accessible by public transport. A 0.8ha minimum site area is considered robust to include this flexibility, as the existing leisure centre site aptly demonstrates, albeit any site close to this area and meeting the three tests of availability, suitability and viability is likely to require more detailed suitability assessment to properly ascertain if the minimum level of development could be appropriately accommodated..

Scope for Disaggregation

- 4.2.6 The Practice Guidance requires developers to consider disaggregating specific parts of the leisure development onto separate sites, although it recognises that authorities should not seek arbitrary sub-division of proposals. In the case of the leisure facilities, it is a multiple use, which could be physically and theoretically be split into constituent parts and so the realistic and practical scope for this requires further consideration.
- 4.2.7 Disaggregation of the core facilities is deemed unreasonable as it would not be practical or viable and sit counter to the leisure centre model and need to replace the existing facility which follows the traditional leisure centre format. The key intention of the proposed new leisure facilities is as a baseline to provide like for like facilities to those existing, but to also provide further facilities to meet the identified needs of the district.
- 4.2.8 Where disaggregation can reasonably be considered is in respect of the proposed external facilities, namely the synthetic 3G pitches. It is not uncommon that multi-use 3G facilities are provided as standalone development, or linked to schools or sports club. In this case however, the provision currently proposed is more bespoke and limited to 5-a-side use for only 2 pitches (compared to a standard/full sized 3G pitch which would usually allow subdivision to form 4 smaller 5-a-side pitches. As such, this form of provision is less likely to be viable and therefore deliverable as a standalone facility. For this reason and given that it forms an integral component of the current draft mix in the context of identified supply and need, The ability for a site to deliver this facility alongside the leisure centre is considered material. Notwithstanding this and for the reasons outlined in 4.2.4, for the purposes of undertaking an initial site sieving exercise based on size, it is considered more appropriate to exclude this from the minimum site area as any sequentially preferable site that meets all other requirements with the exception of that would reasonably require careful consideration.
- 4.2.9 Furthermore, in the context of a town centre sequential test assessment, the provision of an external 3G pitch in town centre locations is considered out of character and unreasonably land-hungry (albeit less so for the model envisaged). Accordingly, for the purposes of this assessment, a 3G pitch has not been included in determining the minimum site area and similarly, was not included in the 2015 design feasibility that considered minimum site areas.

Other Considerations

- 4.2.10 In addition, the leisure centre is considered to require the following:
- Easy access to the road network and public transport links – a leisure centre must be accessible to users by a range of means. This is particularly relevant given the references to accessibility in the development plan. Advice has been sought from DHA Transport where required in respect of accessibility, parking and other related highway matters.
 - Prominence – given the civic nature of the use and the status of the facility as the key sports facility in Dover, it is considered necessary for the building to have a reasonable degree of prominence or favourable location strategically, which in itself can also assist with wayfinding and legibility for users.

- 4.2.11 These factors have been taken into consideration in assessing potential sites. The sequential assessment of the site is set out on the following pages and broken down into town centre and edge of centre sites, followed by further assessment of non-centre urban sites as part of this report's wider remit.

4.3 Site Identification

- 4.3.1 Having established the parameters for the site requirements, and the degree of flexibility in provision and scale, it is necessary to identify individual sites in the town centre and edge of centre for detailed assessment.
- 4.3.2 In this regard, site identification has been undertaken in a methodical, multi-method manner in order to comprehensively search the relevant areas for sites that should be considered and ensuring that no potential sites go unassessed. This work was primarily undertaken in April and May 2016.
- 4.3.3 Firstly, a review of the sites identified within the 'Feasibility and Options Appraisal Study for Dover Leisure Centre', December 2015 was undertaken. The Sports Consultancy, in partnership with GT Architects, Faithful+Gould and Hadron Consulting, was appointed by Dover District Council in July 2015 to complete a feasibility and options appraisal study for the improvement and replacement of the existing Dover Leisure Centre. The process involved a detailed evaluation of some potential alternative sites in broad alignment with the requirements of a sequential test (albeit not all were town centre or edge of centre). Whilst the original feasibility work was extensive, the study provided the foundations for a further comprehensive independent site search to be conducted.
- 4.3.4 Secondly, a desk-based search using the local authority online planning database was undertaken to identify all sites allocated for development within the Development Plan, and/or with planning permission for a *leisure use/ leisure centre* or similar development. Where this was lacking, the planning department was contacted by telephone to identify any relevant past permissions, which was necessary given the absence of a map-based search facility on the Council's online database. The Council's Strategic Housing Land Availability Assessment (SHLAA) was also examined. Whilst this considers sites in relation to residential development opportunities, it offers a useful indication of the potential availability of sites.
- 4.3.5 Thirdly, the Proposals Map was examined to identify any sites with site-specific policy designations that may offer potential for leisure developments, even if not explicitly identified as a potential use in the policy.
- 4.3.6 Fourthly, local listings from land and other agents were reviewed to identify the sites currently being marketed, either specifically for leisure use or generally and unspecified development potential. Agents would be contacted directly where required to obtain more detailed information on sites.
- 4.3.7 Fifthly, the Dover urban area was visited and explored on foot and by car to identify any sites either being actively marketed on the ground which may have been missed during local listings search, or which in the opinion of DHA Planning, may have the potential for redevelopment either by virtue of being presently vacant or being physically well suited to a development of the nature proposed.

- 4.3.8 The area of search was defined using the Proposals Map, which plots the town centre boundary for the centre. This boundary was also plotted on Google Earth base aerial photograph in order to accurately define the 'edge of centre' zone for the identified centre. Here, the distance from the centre could be measured and calculated using the integrated Google Earth measuring tool to establish the geographical extent of 'edge of centre', being 300 metres in accordance with the National Planning Practice Guidance definition of 'edge of centre'.



Figure 4.1: Dover Town Centre (edged red) – Image courtesy of Google Earth

4.4 Site Assessment

- 4.4.1 Each site identified in accordance with the methodology set out at 4.3 was subsequently assessed individually in accordance with the National Planning Practice Guidance.
- 4.4.2 In this regard, each site was assessed on the basis of its suitability, availability and viability.

Suitability

- 4.4.3 Each site identified via the means outlined above has been visited in order to consider its potential to accommodate the proposed development, having regard to the identified site requirements in terms of scale, accessibility and locational context (e.g. neighbouring uses may make a site that was otherwise suitable unsuitable). Based on this, a judgement has been made on whether the site is suitable for the proposed leisure use, and if so, whether it is suitable for a leisure centre of the type and scale proposed.
- 4.4.4 In determining suitability, it is also necessary to consider the prospects of securing the necessary consents for the proposed development. This process is informed via planning history research of each site to determine what has previously been granted or refused and why, and a review of any relevant planning policy or designations which would be material to any planning application. This is therefore a professional planning judgement. Further specialist advice on highway related matters where appropriate.
- 4.4.5 In making a qualitative judgement on suitability, and as set out within the National Practice Guidance, it is also necessary to consider the nature of the scheme, the attractiveness of linkages, and the way in which the scheme will operate as an integral part of the centre. As there are subjective judgments involved in some aspects of suitability, it is necessary in the interest of robustness, to log all such comments in the assessment matrix.

Availability

- 4.4.6 Where a site is being actively marketed, its availability is clear. Where this is not the case and enquiries made do not yield a definitive answer, an educated judgement is made based upon the facts. For example, if a site has been subject to recent planning applications for a certain use but no operator has been named or development commenced, there is a likelihood that the site owners would be open to redevelopment. Conversely, where there is no such indication available and a site is clearly in multiple ownerships, it can be deduced that site assembly and therefore availability are likely to prove problematic. Where a site is identified as both suitable and viable, further more concrete enquiries to determine availability are made, given that this then becomes the decisive factor in the assessment.
- 4.4.7 It is also important to consider the nature of any availability and whether a site is available on a freehold or leasehold basis, and also if deemed unavailable, whether there is any prospect of the site becoming available in the near future.

Viability

- 4.4.8 Viability of a site, as the National Planning Practice Guidance confirms, rests with market factors (including potential alternative uses, adjacent uses, level of demand etc) cost factors (including any exceptional site or planning costs), and delivery factors (phasing considerations, site ownership issues, s106 requirements etc). These by their nature require detailed financial and market assessment on a site basis and are therefore only considered where a site is deemed both suitable and available, and where this level of assessment thus becomes necessary.
- 4.4.9 The following sections considers those sites identified following the methodology described above, grouped into town centre sites (the most sequentially preferable), edge of centre

sites (next most preferable sequentially) and other urban sites. It is important to note that the other urban sites considered do not strictly form part of the sequential test assessment, but instead a wider assessment that reflects the policy context which applies in this case.

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5 Site Assessment – Town Centre

5.1 St James

- 5.1.1 This is an identified development site in the Local Plan under Saved Policy AS9. The saved policy allocates the site for a mixed use scheme including B1 employment, retail, residential, leisure and tourism uses. This allocation is reinforced and reiterated within the adopted Land Allocations Local Plan (2015 – page 46). The extent of the allocated site as shown at Figure 5.1, includes the existing leisure centre site.
- 5.1.2 The large majority of the site (i.e. excluding the existing leisure centre site) has secured planning permission for a mixed retail and leisure-led development and is currently under construction. As part of this approved and implemented scheme, there is no inclusion or provision of a leisure centre, with the majority of alternative space on site taken or under offer (source: www.stjamesdover.co.uk).
- 5.1.3 Therefore although the wider allocated site is suitable in size and location, it is not available and requires no further assessment or consideration. The existing leisure centre site is considered separately below as an edge of centre site.

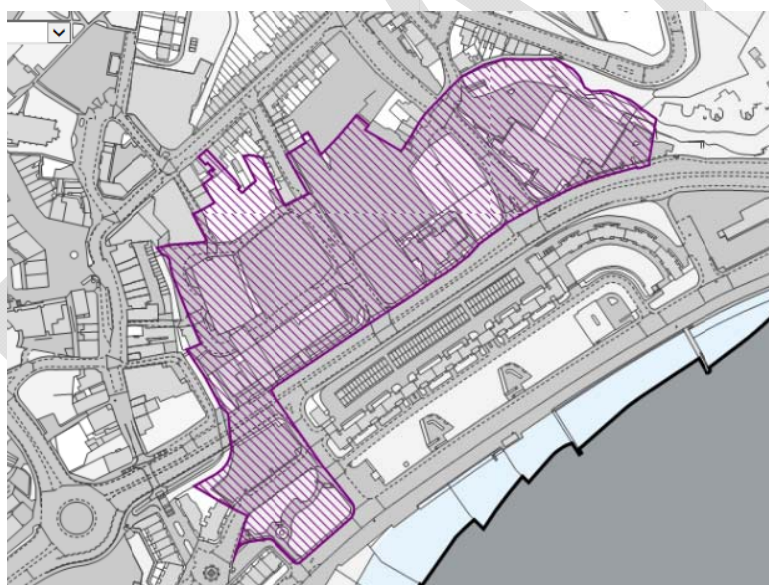


Figure 5.1: Proposals Map Extract – Policy AS9, St James Allocation



Figure 5.2: St James development Location Plan – courtesy of www.stjamesdover.co.uk



Figure 5.3: St James development Layout Plan – courtesy of www.stjamesdover.co.uk

5.2 Dover Waterfront (South of A20)

5.2.1 This site is an identified development site in the adopted Core Strategy under Policy CP8 “for a mixed use scheme including retail (A1 uses up to 20,000 square metres floorspace), restaurants, cafés and drinking establishments (A3 and A4 uses up to 7,000 square metres), assembly and leisure (D2 uses up to 15,000 square metres), residential (C3 use of at least 300 homes), offices (B1) and hotel (C1) uses”. Given this allocation, a mixed use development at the site could in principle accommodate leisure uses in the form of a leisure centre. For the purposes of this

site assessment, the Waterfront allocation south of the A20 has been assessed separately from the land north of the A20 at Bench Street (see below).

- 5.2.2 The site is by its nature constrained physically by the central marina, which does not provide any clearly developable and contiguous parcels of land. Large spaces which do exist, such as the car park to the north west of the marina is still of insufficient size (c.0.5 hectares) and awkward in its linear configuration. Any development of this part, it is assumed, would be dependent upon relocation of the Marina, planned as part of the Western Docks Revival, making delivery within a reasonable timescale almost certainly not possible. Whilst the policy refers to some potential infilling of the doc to help facilitate development, this would represent an additional, and likely not insignificant, extraordinary cost of development.
- 5.2.3 Other available parts of the site comprise small parcels and are not suitable (such as those advertised on site off Cambridge Crescent) for the development sought, instead comprising largely refurbishment opportunities. It is also noted that Policy CP8 seeks a coordinated masterplan approach and comprehensive site-wide proposals.
- 5.2.4 The Port of Dover have been contacted (twice) to enquire about availability and their wider development plans but a response still awaited. In any event, it has been shown that no suitable opportunity exists on site., notwithstanding the allocation.



Figure 5.4: Proposals Map Extract – Policy CP8, Dover Waterfront Allocation

5.1 Dover Waterfront (North of A20 – Land at Bench Street)

- 5.1.1 This land, as referred to at 5.2 above, forms part of the identified development site in Core Strategy Policy CP8 (part of Waterfront allocation). As such, a mixed-use development would in principle be able to suitably accommodate leisure uses and remain in accordance with Policy.

- 5.1.2 The site lies immediately north of the A20 and includes vacant/derelict buildings on a prominent frontage and approach into the town. The remainder of site is predominantly occupied and in active A1/A3/A4/A5 uses. As such, the currently available land is insufficient in size. It is assumed that the land is in multiple ownerships, but lack of suitability (size) doesn't warrant further investigation.
- 5.1.3 The site is currently constrained by the existing underpass leading to the Waterfront to the south, which it is assumed would be replaced by an overground link as part of any comprehensive redevelopment, as sought by the allocation policy. This could help remove what might otherwise be a physical constraint to development, but the policy does refer to The policy also states that "It may also be appropriate to include a foreground building on the northern side of the A20", with reference to the important views towards a landmark building to the south, which the policy seeks. It is considered unlikely that a building of the scale and mass required to accommodate the leisure centre would satisfy this policy objective.
- 5.1.4 Given the above, whilst the overall land allocated as part of Policy CP8 north of the A20 appears to be sufficient in size, the immediately available land is not and it is considered unlikely that a development of the nature sought and required would satisfy the design criteria of the allocation policy. Further information regarding land ownership and anticipated timescales for masterplan development would assist in further assessing the site, but based on the information available the site would not appear immediately available or suitable.



Figure 5.5: Proposals Map Extract – Policy CP8, Dover Waterfront Allocation

5.2 Maison Dieu

- 5.2.1 This site forms part of the Dover Mid Town allocation set out in Core Strategy Policy CP9. This policy allocates the site for mixed use development of C2 uses (residential institutions), C3 uses (residential of at least 100 homes), A1 shop uses, A3 restaurants and cafés uses and A4 Drinking establishments uses (of up to 15,000 square metres), D1 (non-residential institutions), the redevelopment of South Kent College (around 5,000 square metres), and parking to serve the development and the town centre. Whilst D2 leisure uses are not listed, it is considered reasonable to assume that as a defined main town centre use, and in the context of the existing character of public and civic uses, there would be no in-principle objection, albeit the exclusion of this use is notable by contrast to other town centre allocations where this use is specified.

- 5.2.2 The policy preamble confirms that the site is defined in a broad way to enable a comprehensive view of its future to be taken and that this does not imply that all buildings within it are proposed for redevelopment. In reviewing the land within the allocation, the only parcels deemed to have a reasonable possibility of being available and suitable in size is the surface car park outlined in blue at Figure 5.7 below. In considering this, it was considered prudent to also consider the adjoining health centre for completeness.
- 5.2.3 As the aerial photograph shows, the site is primarily existing car park, partly designated for Health Centre use. The Council's Parking Strategy (Draft 2007) shows relatively low occupancy and low quality scoring and so scope for redevelopment (consistent with Local Plan) in principle is considered likely to exist. It is though noted that Dover is shown to be poorly served relative to retail floorspace compared to competing centres and the strategy assumes re-provision as part of any redevelopment.
- 5.2.4 The car park falls slightly under 0.8Ha in size. It was considered as part of the original feasibility, which shows the site to be very constrained to accommodate Option 4. It would also not allow for 3G 5-a-side provision as per the current proposals.
- 5.2.5 The NHS have been contacted regarding availability in any event (to see if the Health Centre site is likely to be available in the near future or not and to understand availability of their parking area). The NHS in response have confirmed that the site is not available. Notwithstanding this if any redevelopment ever were to come forward in the foreseeable future, it would need to include re-provision of the clinical facility. The site is self-evidently not big enough to deliver this, re-provide parking and the leisure centre and as such no further assessment is necessary.

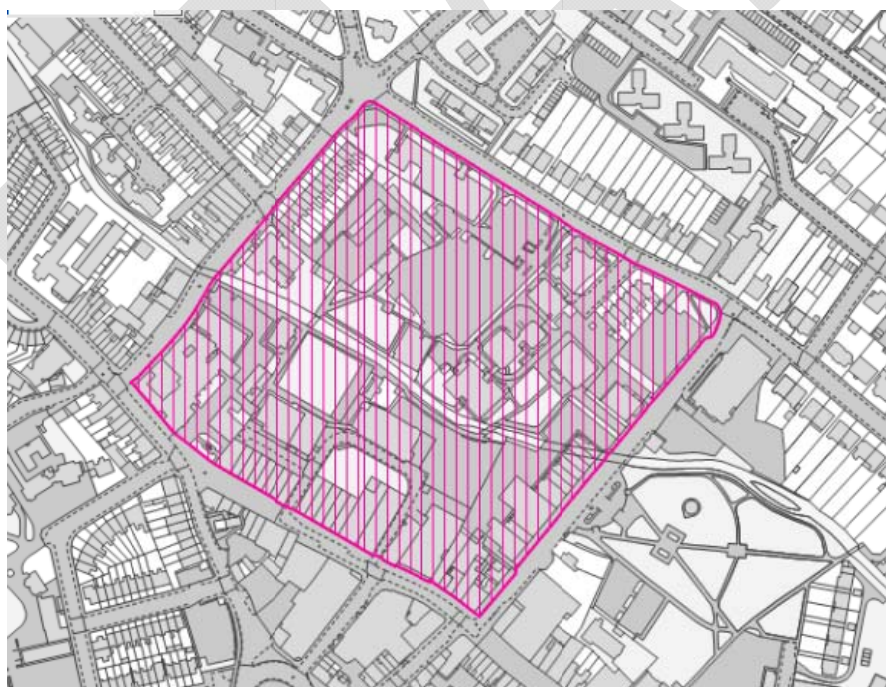


Figure 5.6: Proposals Map Extract – Policy CP9, Dover Mid Town Allocation

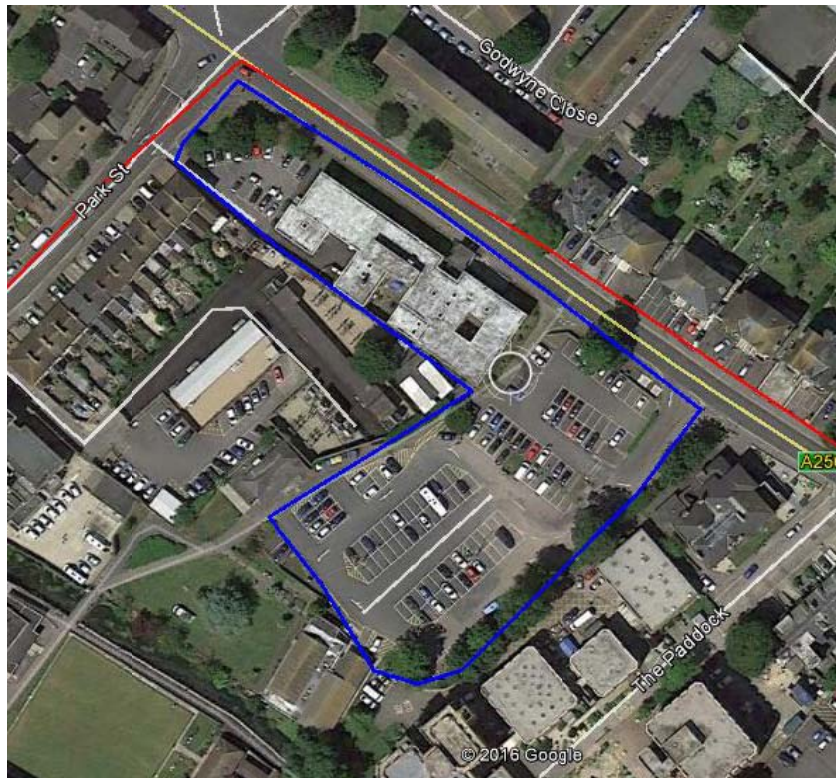


Figure 5.7: Maison Dieu Car Park & Health Centre (edged blue) – Image courtesy of Google Earth

6 Site Assessment – Edge of Centre

6.1 Dover Leisure Centre

- 6.1.1 The 2015 feasibility considers refurbishment and concludes this is neither cost-effective nor will it yield the quality of provision sought. In any event, it is likely to be highly disruptive to ongoing provision, even if it were possible to maintain some degree of public access during that period, which is deemed doubtful.
- 6.1.2 Redevelopment is not a suitable option as it would require a lengthy break in service provision of approximately 18 months. Discussions with the Council have confirmed that such a scenario will not be entertained in the interests of local leisure facility provision, and given the site's role as the principal indoor leisure facility at the District's largest and principal settlement, that is considered a reasonable position and one supported in planning terms through the need to deliver sustainable development. This is therefore considered a reasonable and highly relevant consideration in respect of suitability.
- 6.1.3 Although the Option 4 footprint can just be accommodated on site (as the 2015 feasibility shows), the site is not suitable due to the need for ongoing service provision. It would also not allow provision of 3G 5-a-side pitches as per the current proposals.



Figure 6.1: Proposals Map Extract – Policy AS9, part of St James Allocation

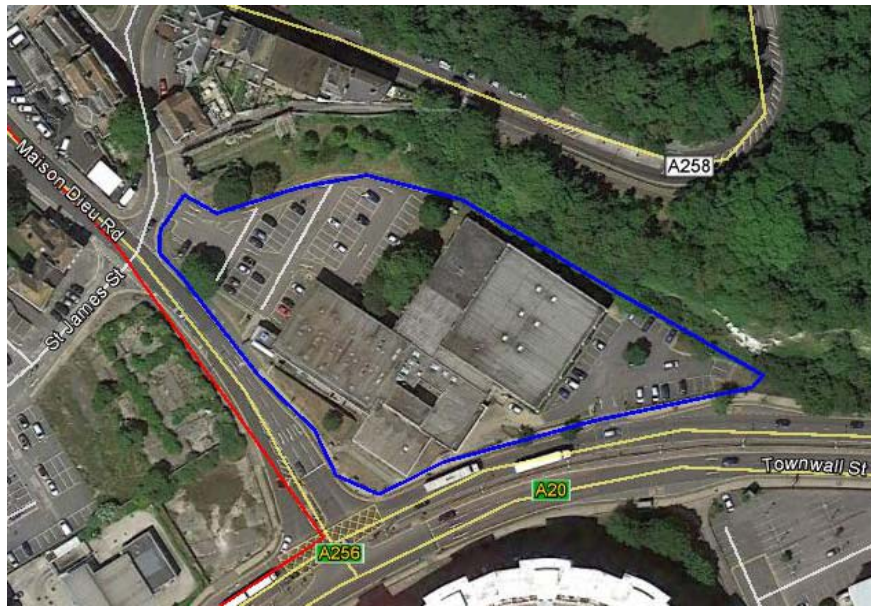


Figure 6.2: Dover Leisure Centre (edged blue) – image courtesy of Google Earth

6.2 Albany Car Park

- 6.2.1 This is an identified development site in the Local Plan (Land Allocations Local Plan Policy LA4) and so can reasonably be considered available for development (albeit identified for c. 15 dwellings).
- 6.2.2 At 0.4ha, the site is too small and therefore not suitable.
- 6.2.3 The site is also constrained by heritage designations and topography relative to adjacent development.

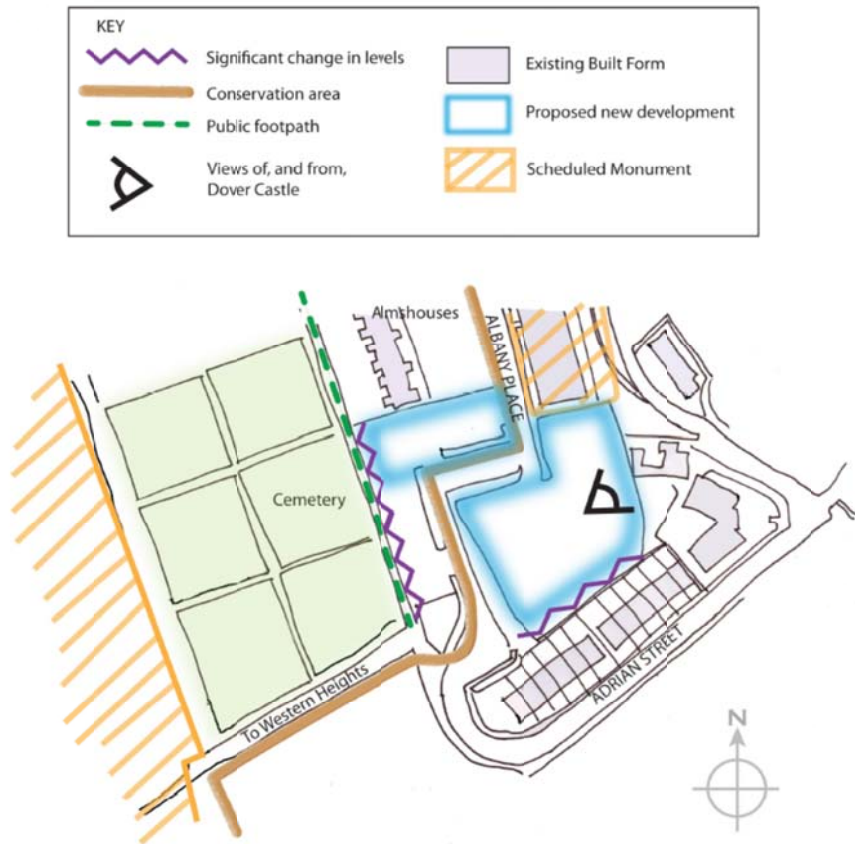


Figure 6.3: Albany Car Park Allocation – extract from Land Allocations Local Plan (2015), Policy LA4

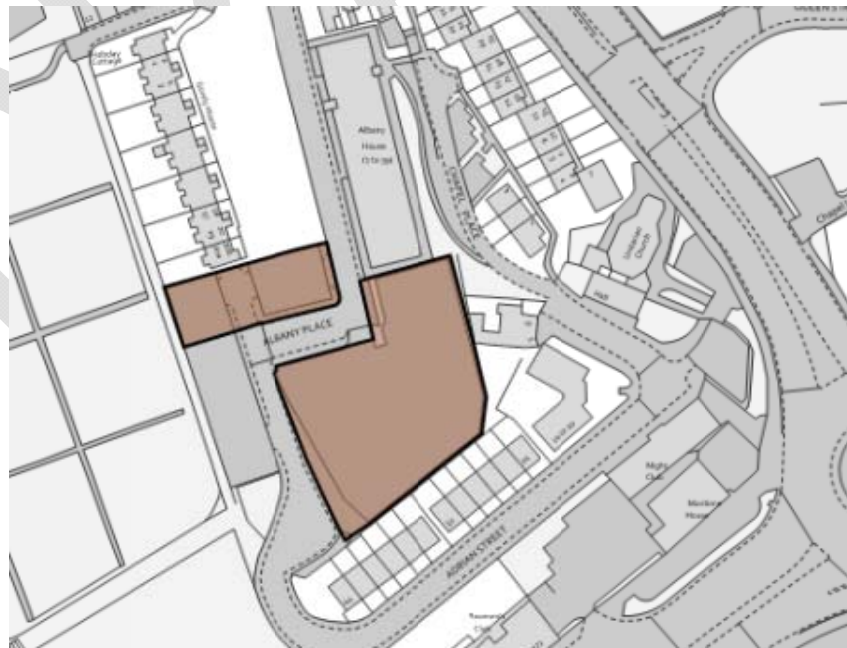


Figure 6.4: Proposals Map Extract – Policy LA4, Albany Car Park Housing Allocation

6.3 Former Charlton Sorting Office

- 6.3.1 This is an identified development site in the Local Plan (Land Allocations Local Plan Policy LA3) and so can reasonably be considered available for development (albeit identified for c. 15 dwellings).
- 6.3.2 A previous planning application for residential development was withdrawn and the site is now being actively marketed and so is confirmed as available.
- 6.3.3 At 0.68ha the site is too small to accommodate the development, a position exacerbated by its linear configuration given that the leisure centre requires a more square form. Given this, the site is not suitable and further direct enquires regarding availability are not necessary.



Figure 6.5 Proposals Map Extract – Policy LA3, Former Charlton Sorting Office Housing Allocation

7 Site Assessment - Other Urban Sites

The following sites are neither town centre nor edge of centre and do not therefore form part of the sequential test assessment as required by policy (i.e. in policy terms are no more sequentially preferable than the identified White Cliffs Business Park site), but are included for completeness. For ease of comparison, the proposed White Cliffs Business Park site is also included and assessed.

7.1 Buckland Mill

- 7.1.1 The site is identified in the Local Plan for residential development (Land Allocations Local Plan Policy LA9 – 265 dwellings).
- 7.1.2 Although leisure development does not form part of this development sought by the policy, it is a clear larger scale development opportunity.
- 7.1.3 The site owners (HCA) have been contacted and have very firmly confirmed that the site would not be available for leisure centre development. It is not therefore available and likely not to be suitable in light of its prescriptive residential allocation.

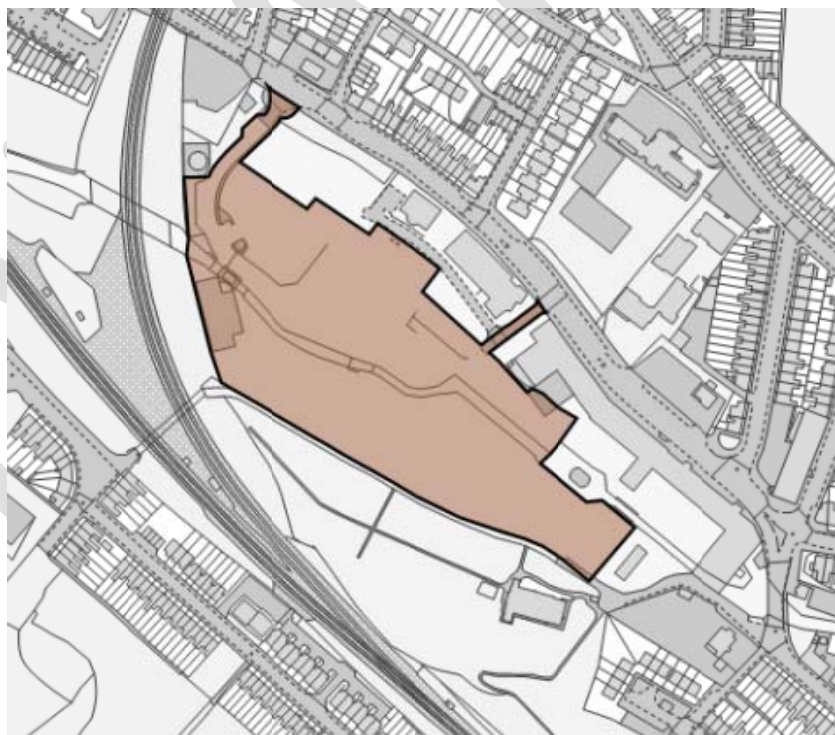


Figure 7.1: Proposals Map Extract – Policy LA9, Buckland Mill Housing Allocation

7.2 Westmount

- 7.2.1 The site is of sufficient size and well located in relation to the train station.

- 7.2.2 The site has recently been cleared and buildings demolished with groundworks ongoing. Land Allocations Local Plan Policy LA10 identifies the site as a residential allocation for approximately 100 dwellings.
- 7.2.3 Residential planning permission was secured for the site in September 2009.
- 7.2.4 The Churchgate (developer) website confirms that the site is now being developed and is not therefore available and does not warrant any further assessment.



Figure 7.2: Proposals Map Extract – Policy LA10, Westmount Housing Allocation

7.3 Land East End of Coombe Valley Road

- 7.3.1 Land here is in varying industrial use and so not readily 'available'. It is though identified as part of the wider Coombe Valley development area in the Local Plan under the terms of Land Allocations Local Plan Policy LA8 for an estimated 450 residential dwellings.
- 7.3.2 Of the land shown in Figure 7.3 below, the most obviously developable site lies adjacent to the gas holder and there are therefore likely to be Health & Safety Executive (HSE) issues to overcome and/or additional costs to development as a result.
- 7.3.3 The plot to the immediate east of the gasholder measures approximately 0.7ha and is therefore slightly too small to accommodate the minimum required form and amount of development.
- 7.3.4 Coombe Valley Road represents a secondary urban location, separate from main transport nodes and the main road network, limiting prominence and legibility for potential users. In any event, it was considered relevant for the Coombe Valley potential development sites to be considered in more detail in respect of highway considerations to explore this issue further.

- 7.3.5 From the A256 London Road, vehicles would turn onto Coombe Valley Road via a signalised junction to access the site. From here vehicles would go under a narrow signalled railway bridge. Both of these restrictions on the network may need to be modelled to identify if they have capacity for any increase in flows as a result of a leisure centre development.
- 7.3.6 Coombe Valley Road is provided with footways so safe pedestrian access is possible, however, those on foot would need to cross the road after walking under the railway bridge.
- 7.3.7 Two bus stops are provided on Coombe Valley Road but these are only served by two routes, both operating between Aycliffe and Whitfield (60 and 60A). A wider range of services are provided on the A256 (60, 60A, 61, 61A, 62, 87, 88, 88A, 89, 89A, 91, 93, 96, 541, 991) some 350m away.
- 7.3.8 It is anticipated that the site would require a reasonable level of parking to reflect its slightly out of centre location. However, good bus access from London Road may allow for some flexibility.
- 7.3.9 The sites generally benefit from existing access onto Coombe Valley Road, which is likely to be suitable for the proposed use with slight modifications. Rear access from Prospect Place would not be suitable.
- 7.3.10 This assessment is considered to be consistent with the view that Coombe Valley comprises a 'secondary' location which would not readily meet the requirements of the development as set out in this report.

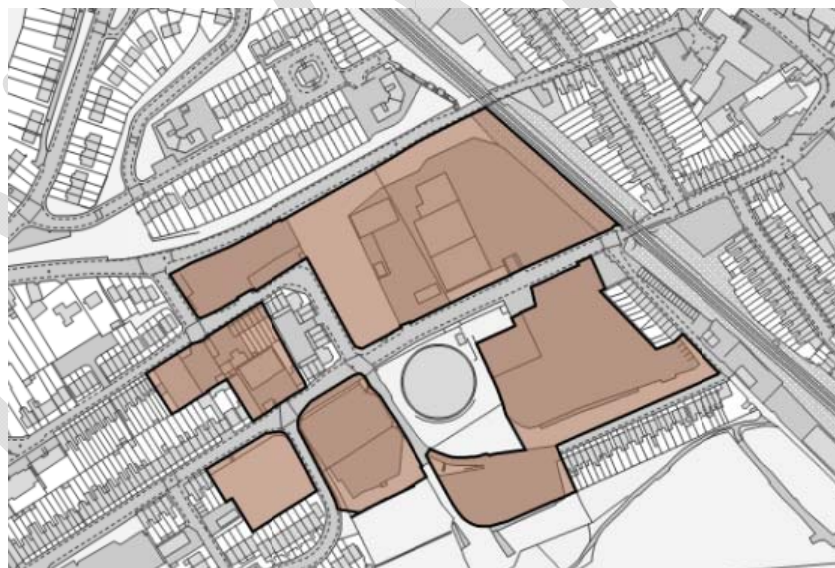


Figure 7.3: Proposals Map Extract – Policy LA8, Coombe Valley Road Housing Allocation (east end)

7.4 Former Buckland Hospital Site

- 7.4.1 This site, also located on Coombe Valley Road further to the west, is vacant and was recently to be taken to auction. It is understood however from speaking with the site owners KCC, that the site was withdrawn from the recent auction to allow further discussions to take place between them and the NHS to fully explore any potential healthcare related

developments. It is understood that in the event those discussions are not concluded positively, it would be put back for auction. Given this, there is some uncertainty over availability at the present time.

- 7.4.2 The vacant part of the site is large enough to accommodate the minimum amount and form of development required.
- 7.4.3 None of the existing buildings are understood to be listed, but do provide some non-designated heritage value to consider in the terms set out within the NPPF.
- 7.4.4 The existing Land Allocation Local Plan refers to residential development here (450 units across Coombe Valley area) with no provision for leisure referenced.
- 7.4.5 The site is remote from strategic routes, with the same highways assessment applying as set out at 7.3 above, but without the added benefit of proximity to London Road and the additional bus services found there.
- 7.4.6 Some potential 'civic/community' synergy could be delivered with the adjacent new hospital in terms of character and use, but this would be to the detriment of housing delivery in view of the current allocation and at secondary location away from main roads and routes. It is not therefore considered suitable, whilst availability remains uncertain.

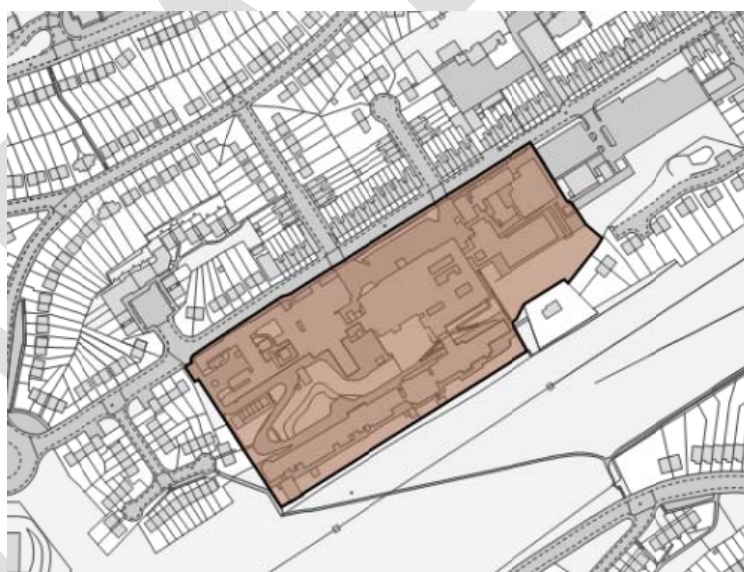


Figure 7.4: Proposals Map Extract – Policy LA8, Coombe Valley Road Housing Allocation (Former Buckland Hospital)

7.5 Land at Western End of Coombe Valley Road

- 7.5.1 This land also forms part of the wider Coombe Valley allocation (Policy LA8) and is sited even further from the town centre and main urban area than the Buckland Hospital site considered above. This is considered to be very much a secondary location with no prominence and added potential implications in respect of landscape impact on the AONB, a highly material planning consideration to any development where that applies.
- 7.5.2 The land is a former industrial development and use meaning there are possible implications for construction/decontamination costs.

- 7.5.3 In highway terms, the site is even more remote from strategic routes than noted above at 7.4. For the same but even more applicable reasons as outlined at 7.4, the site is not considered suitable and accordingly enquiries regarding availability are not considered necessary.



Figure 7.5: Proposals Map Extract – Policy LA8, Coombe Valley Road Housing Allocation (west end)

7.6 TA Centre, London Road

- 7.6.1 This site is an identified development site in the Land Allocations Local Plan under Policy LA7 for approximately 10 dwellings.
- 7.6.2 At 0.33 hectares the site is too small and not therefore suitable, with no further assessment required.



Figure 7.6: Proposals Map Extract – Policy LA7, TA Centre, London Road Housing Allocation

7.7 Former Melbourne Community Primary School

- 7.7.1 This site is known to have previously been available (it was promoted by DHA through the Council's SHLAA) but not taken forward for allocation and is now occupied by KCC (Thistley Hill). It is therefore not available and has previously been deemed unsuitable for inclusion in the SHLAA. The site is part allocated for residential development, but that allocation site is not big enough (and in any event for residential development and not leisure use).
- 7.7.2 The site occupies a secondary location and access onto the highway network and in view of this and the above is neither suitable nor available.

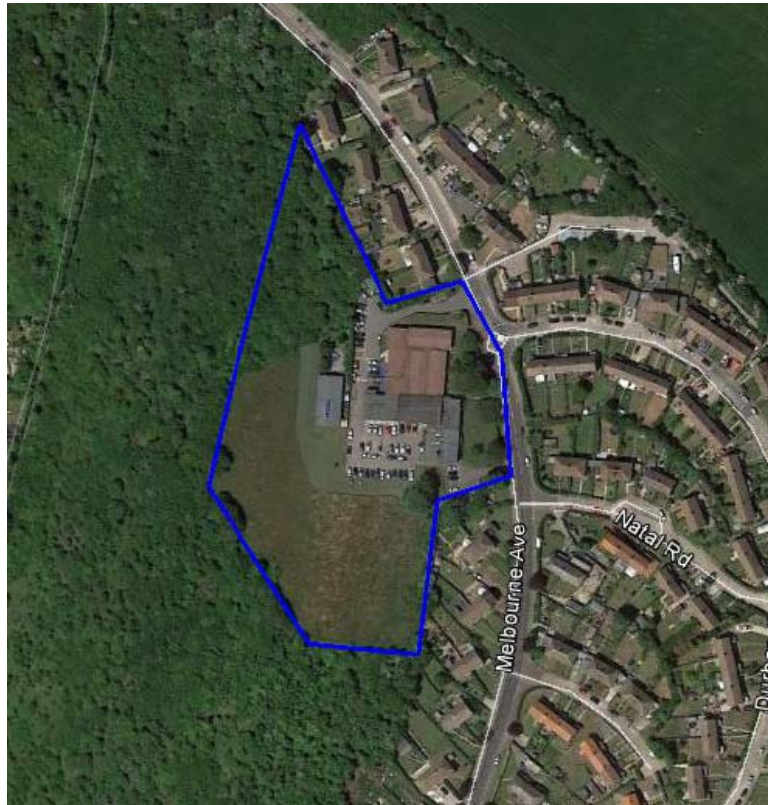


Figure 7.7: Former Melbourne Community Primary School (edged blue) – Image courtesy of Google Earth

7.8 White Cliffs Business Park, Whitfield – ‘Triangle Site’

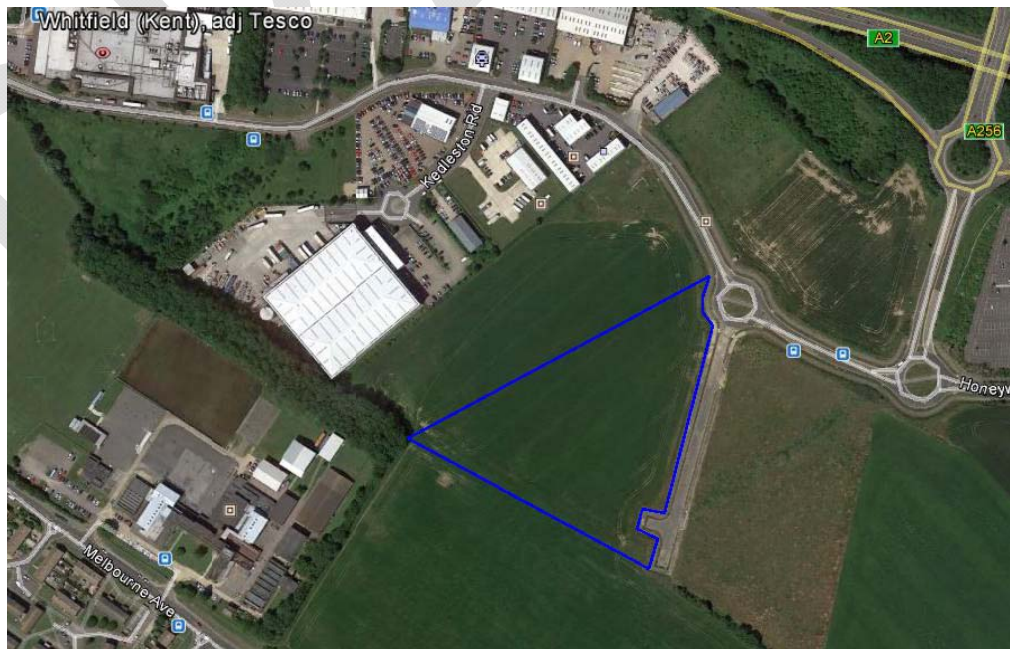


Figure 7.8: Land at White Cliffs Business Park, Whitfield (edged blue) – Image courtesy of Google Earth

- 7.8.1 This site falls within the urban area as defined on the Proposals Map, being part of the White Cliffs Business Park employment allocation at Whitfield. In that respect, the principle of development at this site is broadly accepted by policy, although the allocation for an alternative use would need addressing in any planning application.
- 7.8.2 Design feasibility work has shown the site to be large enough to accommodate the proposed development and it exceeds the minimum 0.8 hectare sieving threshold. Further work would be required on the feasibility of development specifics (and the viability implications of these) such as drainage and services, although assessments instructed by the Council to date have indicated that the site is developable.
- 7.8.3 In highway terms, the site is afforded good vehicle access to the A2 and A256, however, it is not necessarily located in a highly sustainable location.
- 7.8.4 The site is served by a number of bus services (12, 60, 60A, 61, 61A and 89) providing links to Canterbury, Deal and Whitfield generally at a minimum of one bus per hour. It is also understood that a Bus Rapid Transport system is proposed within the area, which will improve accessibility.
- 7.8.5 Pedestrian access would be limited to those living in the small residential area close to the site, however, new good quality lit footways are provided.
- 7.8.6 It is anticipated that the site would require high levels of parking to reflect its out of centre location.
- 7.8.7 The site would require a new access on to Honeywood Parkway, which would need to be designed to the current standards and be subject to a Road Safety Audit.
- 7.8.8 The Council have held constructive discussions with the site owner and it can therefore be regarded as available.

7.9 Land Adjacent to Dover Christchurch Academy

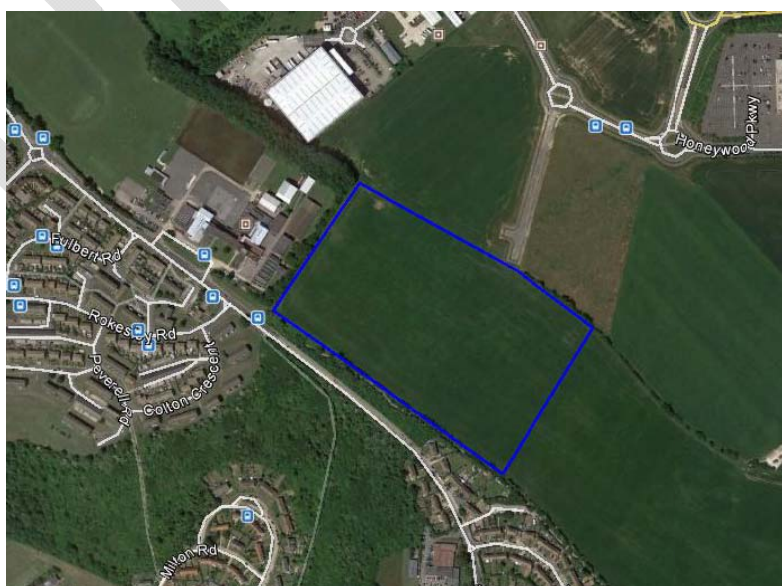


Figure 7.9: Land adjacent to Dover Christchurch Academy (edged blue) – Image courtesy of Google Earth

- 7.9.1 This site sits entirely outside the settlement boundary and is therefore greenfield, unallocated land. There is no direct policy support for such development and as such exceptional justification would be required as part of the wider planning case presented.
- 7.9.2 In pure physical terms, the site is of sufficient size to accommodate the development, although considerable work would be required on the feasibility of development specifics (and the viability implications of these) such as drainage and services.
- 7.9.3 In accessibility and highway terms, broadly speaking the same applies to this site as set out above for the adjacent White Cliffs Business Park site, although it is noted that pedestrian accessibility from the urban area to the south may be achievable, whilst the site is lightly more remote and detached from the existing road network and public transport network.
- 7.9.4 The site is not known to be unavailable and it is understood that some enquiries were made by the Council with the landowner that would support this position, albeit those discussions were not conclusive.

8 Summary & Conclusions

8.1 Summary

- 8.1.1 Dover District Council are pursuing plans for a replacement to Dover Leisure centre, which comprises a 'Main Town Centre Use' as defined within the NPPF. Accordingly, and as directed by policy, a Sequential Test Assessment is required in the event that an out of centre site is proposed. This assessment fulfils that requirement and follows the available and applicable guidance, given that the Council have identified an out of centre site at White Cliffs Business Park, Whitfield as the preferred site.
- 8.1.2 This report offers an independent assessment of potential alternative sites having regard to suitability and availability for the proposed development, the minimum requirements of which have been informed by thorough and well-reasoned feasibility work carried out in 2015.
- 8.1.3 The assessment has drawn upon a range of evidence and methods to identify and assess potential sites. It is intended to inform the Council's ongoing review and decision-making process in the delivery of a new leisure centre and should be subject to ongoing review as and when any new evidence becomes available (such as the results of the recent Brownfield Call for Sites) or new sites identified or suggested. This ongoing review should continue up to the point of planning application submission, if pursued, to ensure a robust document is presented as part of any application that both informs the proposals and informs the local planning authority's determination of the application.

8.2 Conclusions

Sequential Test

- 8.2.1 No site located within the town centre has been identified to date that can reasonably be considered available, suitable and viable for the proposed leisure centre development, even when allowing for some disaggregation of facility in the form of the proposed 3G 5-a-side football pitches.
- 8.2.2 No site located in an edge of centre location, as defined by policy (within 300m of the defined town centre), has been identified to date that can reasonably be considered available, suitable and viable for the proposed leisure centre development, even when allowing for some disaggregation of facility in the form of the proposed 3G 5-a-side football pitches.
- 8.2.3 Accordingly, it is considered that the proposals at Whitfield satisfy the sequential test as set out within and required by the NPPF.

Wider Assessment

- 8.2.4 Separate from the sequential test, other potential sites in the wider urban area have been considered in the interests of informing the overall planning balance and consideration,

particularly in light of the Land Allocations Local Plan stating that *“given that the existing building is near the end of its useful life, an opportunity exists to create a landmark building. Leisure facilities could be located at a different site, so long as it equally accessible to residents”* (Para 3.144).

- 8.2.5 Other sites suitable in size have been identified at Buckland Mill and Coombe Valley Road, however these are all allocated for housing. In contrast, the currently favoured site by the Council as facility provider is allocated for employment, which although not strictly consistent with a leisure use, does still offer employment. Buckland Mill is confirmed by the site owners as unavailable.
- 8.2.6 In locational terms, the potentially available and suitable sites (Coombe Valley Road and Whitfield) are not currently highly accessible by public transport, although the Local Plan does make direct future provision for improved bus services at Whitfield and it provides a more strategically advantageous and prominent location.
- 8.2.7 Therefore, in the wider planning sense, owing to the nature of its allocation (relative to Coombe Valle Road) and the greater scope for public transport access, land at White Cliffs Business Park is considered broadly preferable to other identified alternatives in the urban area. It will be for any subsequent planning application to provide the sufficiently detailed planning case for the development, including a thorough assessment of accessibility relative to alternatives and the existing site.